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AUG 31 2016 August 28, 2016

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U.S. EPA
ATTN: Harbor Comments
805 SW Broadway, Suite 500
Portland, OR 97205

Air and water quality environmental regulations have become superfluous. There has been such a push in recent years to continually make them stiffer and stiffer. I'm no stranger to regulations as a retired civil/structural engineer. I understand regulation can be good, but excessive regulation is not. We have gone overboard with the amount of regulatory requirements in an attempt to satisfy various different interest groups. This has resulted in very high and impractical requirements. The additional cost to society due to these unrealistic expectations is not fair to those who are forced to pay them. Things have just gone too far and honestly, this is all extremely frustrating. The Willamette River cleanup proposal by the EPA is no exception.

Nearly \$1 billion to clean up the river: That's just plain ridiculous! That's an unwarranted amount to spend for something that can be taken care of for far less. That amount of money could (and should) be used for many other, more important problems such as the lead in Portland buildings. These problems are so extreme in our schools that many of them need to be replaced or rebuilt to current building code standards, and particularly to the latest earthquake code standards. We're only going to get a fraction of them reconstructed because most of the available money that was supposed to be used for reconstruction will end up being used just to maintain the schools we currently have. We are simply applying Band-Aid after Band-Aid to this situation and it needs to stop. We do not have the resources to come up with an additional billion dollars for the river cleanup when we can't even take care of our schools in the way they need to be.

It concerns me that the EPA took 12 years to put together a plan for how to deal with the contamination of the Willamette River. Why would it take more than a decade to put out a final report? That's insane and highly inefficient. You cannot rely on ancient data to complete a project today. That in itself makes one lose confidence that these are good recommendations from the EPA. If they are going to go through with this, then they definitely need to do new analysis of the river and adjust their recommendations. And, it should not take another 10+ years to do so. At the very least, review reports done by the Army Corps of Engineers and take their suggestions regarding the best strategy for cleaning things up. If they don't agree with what the EPA wants to do or thinks it is overkill, it should definitely be taken into consideration. The Army Corps are experts in this area and should absolutely be utilized to the fullest when making the best decision for Portland environment and the community.

The river is actually restoring itself at a pretty significant rate. Why are we even considering a sacrifice of money we don't have, taking away from our schools in severe need, and disturbing a natural process that is working on its own, when there is no need to do so? The contamination is contained, so let's not stir it back up and take a huge risk that Portland can't afford to take by following through with the EPA's plan.

Sincerely,
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Portland, OR 97213

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